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*Attorneys for Defendant
 Walmart, Inc.*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

ORTHULA OLETA HOLLINS, an individual,

 Plaintiff,

 vs.

Case No.: 2:24-CV-02045-JAD-DJA

**STIPULATION AND ~~[PROPOSED]~~
 ORDER TO CONTINUE DISCOVERY
 DEADLINES**

[FIRST REQUEST]

WALMART, INC., d/b/a WALMART
 #2050; WAL-MART STORES, INC.; WAL-
 MART NEIGHBORHOOD MARKET; DOE
 PROPERTY OWNER I-V; ROE PROPERTY
 OWNER I-V; DOE EMPLOYEE I-V; ROE
 JANITORIAL COMPANY I-V; ROE
 MAINTENANCE COMPANY I-V; ROE
 PROPERTY MANAGEMENT COMPANY
 IV; DOE MAINTENANCE WORKER I-V;
 DOE PROPERTY MANAGER I-V; DOE
 EMPLOYEE I-V; ROE EMPLOYER I-V; and
 ROE COMPANIES I-V, inclusive, jointly and
 severally,

 Defendants.

COME NOW Plaintiff ORTHULA OLETA HOLLINS, by and through her attorney of record,
 DANIEL E. JOSLYN, ESQ., of the law firm of GINA CORENA & ASSOCIATES, and Defendant
 WALMART, INC., by and through its attorneys of record, TABETHA A. MARTINEZ, ESQ., and
 JAMES W. FOX, ESQ., of the law firm of BURGER, MEYER & D'ANGELO, LLP, and hereby

submit the following Stipulation and [Proposed] Order to Extend Discovery Deadlines (First Request) for this Honorable Court's consideration (**proposed changes in bold**), seeking to extend the remaining deadlines in the current scheduling order for a period of ~~sixty (60) days~~ ^{ninety (90)} for the reasons explained herein.

Pursuant to Local Rule IA 6-1(a), the parties hereby aver that this is the ~~second~~ ^{first} discovery extension requested in this matter.

DISCOVERY COMPLETED

- The parties have conducted a Rule 26(f) conference and served their respective Rule 26(a)(1) disclosures and supplements thereto.
- The parties have exchanged written discovery and responses.
- Defendant has issued subpoenas to Plaintiff's relevant medical providers.
- On November 20, 2024, the Rule 35 Exam was conducted with Defendant's expert Dr. Holman Chan
- On May 23, 2025, the parties exchanged Initial Expert Disclosures.
- The deposition of Plaintiff is currently set for June 27, 2025.
- The deposition of Walmart's 30(b)(6) Designee is currently set for July 10, 2025.

II. REMAINING DISCOVERY

- Depositions of Plaintiff's expert witnesses, John R. Peterson and Randa Bascharon, D.O.
- Depositions of Plaintiff's treating physicians
- Depositions of Walmart's employees
- Continued subpoenas to Plaintiff's medical providers.
- Additional written discovery as needed.

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REASON FOR REQUESTING ADDITIONAL TIME TO COMPLETE DISCOVERY

The Parties aver that good cause exists under Local Rule 26-3 for the requested extension being made at this time. The Parties have been diligently working to complete discovery in this matter. The Parties have: (1) engaged in written discovery; (2) disclosed and supplemented their FRCP disclosures; (3) scheduled multiple depositions; and (4) exchanged initial expert reports. Additionally, Plaintiff's Motion to Amend Complaint and Add Parties is pending the court's ruling. As such, good cause exists for extending the remaining discovery deadlines. The additional time will give the parties adequate time to take the depositions of Plaintiff's experts, Walmart's employees, and complete all remaining necessary discovery. The Parties have acted in good faith to request this extension and neither one has reason or intent to delay these proceedings or jury trial in this matter.

- **IV. PRIOR DISCOVERY DEADLINES**

- According to the Court's Order Granting Stipulated Discovery Plan [ECF No. 12], the existing deadlines are:

- Amend Pleadings/Add Parties: Expired
- Initial Expert Disclosures: Expired
- Rebuttal Expert Reports: Expired
- Close of Discovery: July 25, 2025
- Dispositive Motions: August 25, 2025
- Joint Pre-Trial Order: September 24, 2025, or 30 days

following the resolution of any outstanding dispositive motions.

- **V. PROPOSED DISCOVERY DEADLINES**

- Amend Pleadings/Add Parties: Expired
- Initial Expert Disclosures: Expired
- Rebuttal Expert Reports: Expired
- **Close of Discovery: October 23, 2025**
- **Dispositive Motions: November 24, 2025**
- **Joint Pre-Trial Order: December 23, 2025, or 30 days**

following the resolution of any outstanding dispositive motions.

1 If the extension is granted, all anticipated additional discovery should be concluded within the
2 stipulated extended deadline. The parties aver that this request for extension of discovery deadlines
3 is made by the parties in good faith and not for the purpose of delay.

4 Dated: June 26, 2025

GINA CORENA & ASSOCIATES

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6 /s/Daniel E. Joslyn

Gina M. Corena, Esq.
Nevada Bar No. 10330
Daniel E. Joslyn, Esq.
Nevada Bar No. 14725
Attorneys for Plaintiff

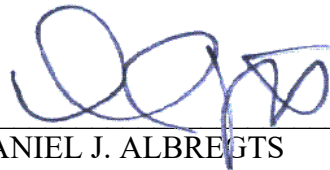
10 Dated: June 26, 2025

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14 Tabetha A. Martinez, Esq.
Nevada Bar No. 14237
James W. Fox, Esq. 13122
Attorneys for Defendant
Walmart, Inc.

18 **IT IS SO ORDERED** this 27th day of June, 2025.

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21 **DANIEL J. ALBREGTS**
22 **UNITED STATES MAGISTRATE JUDGE**